Summary Points from Calbag's Approved Waste Management Plan

1. MDEQ approved Calbag's Waste Management Plan (WMP) via letter correspondence dated June 24, 2016. Within that letter, MDEQ states that concrete demolition, disposal, and filling will require coordination with EPA.

2. The WMP states that decisions regarding use of concrete for fill and for leaving concrete in place are outside the scope of the Calbag AOC with MDEQ and require approval by other regulatory agencies.

3. Calbag's approved Sampling and Analysis Plan (SAP) includes:
   a. Sampling of ground level concrete and basement level concrete to determine if the concrete is hazardous waste with frequencies outlined in Table 2 of the SAP
      - Four (4) composite samples per pot room on each level (ground and basement) – Total of 80 samples to be collected (4 per room x 10 pot rooms x 2 levels)
      - Four (4) composite samples of ground level concrete support structures and walls
      - One (1) composite sample from the concrete wall in the basement at each end of the pot room – Total of 20 samples to be collected (2 per room x 10 pot rooms)

   a) Discrete sampling of stained concrete if visual observations are seen – total TBD.

4. Concrete samples will be analyzed for:
   a. RCRA 8 metals by EPA SW6020/SW7471
   b. Total cyanide by EPA SW9012
   c. Fluoride by EPA 300.0
   d. PCBs by EPA SW8082

5. Concrete sample results will be compared to:
   a. For RCRA 8 Metals - 20 times the RCRA Toxicity Characteristic action levels in 40 CFR 261.24. If any of the total results exceeds 20 times the action level, the sample will be extracted by TCLP, analyzed, and the results compared to the regulatory levels specified in 40 CFR 261.24.
   b. For Cyanide - 40 CFR 261.23
   c. For Fluoride – No regulatory Level
   d. For PCBs – Sampled for the purpose of characterizing concrete for use as fill. The regulatory levels for PCBs are not part of the Calbag AOC. Regulatory levels for PCBs will be determined by CFAC and the remediation departments of the regulatory agencies.

6. Concrete fill will only represent a small percentage of fill for the basements (<20%). CFAC has obtained a permit to obtain material from an un-impacted area of the Site. EPA will need to be involved in approval of that material for fill.

Key questions for discussion between CFAC and EPA

CFAC and Roux Associates are looking to work with the EPA to determine the following:

1. Will the EPA request any additional sampling in order to accept the concrete as fill, other than what is approved by MDEQ in the WMP?

2. Will the EPA request that concrete sample results be compared to any other standards /criteria in order to accept the concrete as fill, other than what is approved by MDEQ is the WMP?

3. How does the EPA expect the concrete work to get incorporated into the larger structure of the AOC between CFAC and EPA? Is a separate SAP required? Will the results be reported separately from the RI/FS activities? Are results shared from Calbag acceptable?

4. Similar questions to the above would also apply to the clean fill.